



INTERLINK L.C.

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May 2, 2002

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, D.C. 20554

*Re: CC Docket No. 02-33
Notice of Proposed Rulemaking (FCC 02-42)*

Dear Ms. Dortch:

On behalf of InterLink L.C., I am writing to express my support for the comments filed on the above-referenced proceeding by The Wireless Communications Association International, Inc. ("WCA"), and to urge the Commission not to impose Universal Service Fund obligations on smaller license-exempt providers of wireless broadband services.

We are a small local business with a staff of just fifteen employees. Since 1999, we have been using the 2.4 GHz and 5 GHz license-exempt bands to provide high-speed Internet access to twenty-four communities (including *schools; community colleges; hospitals*, libraries and in some cases, *the municipal and county governments*), where there is little or no cable modem or DSL service. Even where cable modem or DSL is available, InterLink L.C.'s "**@anywhere**"™ wireless service is the only competitive alternative.

Despite our small size and lack of funding from the government or the capital markets, we have been able to provide our customers with the type of broadband service usually available only in the larger cities, and we are doing so at an affordable price. We also are providing broadband service to area *Economic Development Offices, Chambers of Commerce* and *State Visitors Centers* giving those entities the ability to use broadband to deliver better and more cost-efficient services to their constituents. The value of our service has been recognized by the Iowa Department of Economic Development ("*Smart State Innovator*" Award); the White Press Corps Office (*1999 presidential campaign*); National Science Foundation; Community University of North Wales, U.K. and National Assembly for Wales, U.K. (*as a national model for rural community broadband deployment project*).

Like any other small business, we face many daunting economic challenges but have only limited resources available to us. We therefore are very concerned about the possibility that the



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Commission will subject us to USF reporting and contribution obligations. Indeed, we estimate that our annual cost of complying with USF reporting obligations would be as much as forty thousand dollars (\$40,000.00), not including the additional costs associated with explaining USF charges to subscribers and dealing with any subsequent subscriber complaints.

While we generally support the broad objectives of universal service, we do not believe it is equitable to sacrifice the future of wireless broadband (which operates without subsidy) to support "copper wire" services that wireless is better equipped to provide in underserved areas. Also, we are not an ILEC or a cable MSO, and we simply cannot afford the personnel or administrative resources necessary for USF compliance. Any diversion of what little staff we have will have a direct and immediate adverse effect on our ability to serve our customers. Our business, in other words, would be put at unnecessary risk, and our customers ultimately would pay the price.

We therefore urge the Commission to take these considerations into account and, at a minimum, not impose USF reporting and contribution obligations on smaller license-exempt providers of broadband service. Thank you.

Very truly yours,

A handwritten signature in black ink that reads 'George M. Walden'.

George M. Walden
Vice President – InterLink L.C.
801 Main Street
Keokuk, IA 52632

"**@anywhere...** when it *absolutely, positively* has to be deployed overnight"